

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION**

Application of Dominion Energy South	)	
Carolina, Inc. for Adjustment of Rates	)	DOCKET NO. 2020-125-E
and Charges.	)	
_____	)	

**PETITION TO INTERVENE OF AARP**

AARP<sup>1</sup>, by and through counsel, pursuant to R. 103-825 of the Commission's rules, respectfully petitions the South Carolina Public Service Commission ("Commission") for formal intervention as a party in the above-captioned matter. In support of this petition, AARP states as follows:

1. AARP, with its nearly 38 million members in all 50 States and the District of Columbia, Puerto Rico, and U.S. Virgin Islands, is a nonpartisan, nonprofit, nationwide organization that helps people turn their goals and dreams into real possibilities, strengthens communities and fights for the issues that matter most to families such as healthcare, employment and income security, retirement planning, affordable utilities and protection from financial abuse. AARP has over 600,000 members in South Carolina, many of whom are residential electric customers of Dominion Energy South Carolina, Inc., formerly South Carolina Electric & Gas Company ("Dominion" or "Company").

2. AARP's interest in this matter and its grounds for intervention relate to the significant impact on residential electric rates related to the rate increase requested by the Company in this docket. AARP desires to advocate on behalf of residential electric

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<sup>1</sup>In 1999, the "American Association of Retired Persons" changed its name to simply "AARP", in recognition of the fact that people do not have to be retired to become members.

customers to ensure that rate relief that is prudent, fair, just and reasonable. More specifically, AARP's interest relates to how the utility's request, if granted, could impact those customers who are aged 50 and over. People aged 50 and over are impacted most directly by variations in energy prices. These consumers also devote a higher percentage of their total spending than do other age groups towards residential energy costs.

Many older consumers also have special needs and safety concerns about their access to electric service. AARP wishes to ensure that residential energy customers, including those over age 50, are treated reasonably in any final order arising from this matter.

3. AARP's specific interest in this proceeding will not be adequately represented by other parties. AARP believes that its intervention and participation in this proceeding would serve the public interest, and wishes to become a party to this case for all purposes. Moreover, AARP can assure that its intervention would not unduly delay the proceedings nor prejudice the rights of any other party.

4. AARP is represented by the following counsel in this proceeding:

Adam Protheroe  
South Carolina Appleseed Legal Justice Center  
PO Box 7187  
Columbia, SC 29202  
(803) 779-1113

John B. Coffman (*pro hac vice* to be filed)  
John B Coffman, LLC  
871 Tuxedo Blvd.  
St. Louis, MO 63119-2044

WHEREFORE, AARP respectfully requests that the Commission grant its Petition to Intervene, entitling it to fully participate in this proceeding.

Respectfully submitted,

s/ Adam Protheroe

Adam Protheroe  
South Carolina Appleseed Legal Justice Center  
PO Box 7187  
Columbia, SC 29202  
(803) 779-1113

Attorney for AARP

Dated: September 24, 2020

### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the official service list in Docket No. 2020-125-E at the South Carolina Public Service Commission, on this 24<sup>th</sup> day of September, 2020.

Signed: September 24, 2020

s/ Adam Protheroe